

Message

From: Carl Palmer [cpalmer@tdxassociates.com]
Sent: 7/16/2018 1:08:14 PM
To: Fruitwala, Kishor [Fruitwala.Kishor@epa.gov]; Tidmore, Guy [tidmore.guy@epa.gov]; Lushek, Robert [Lushek.Robert@epa.gov]; Young, Jessica [Young.Jessica@epa.gov]; Shah, Harry [shah.harry@epa.gov]; Galbraith, Michael [Galbraith.Michael@epa.gov]
CC: Gregg Meyers [gmeyers@tdxassociates.com]; George Hay [ghay@fmtinc.com]; Brian Lindman [Brian.Lindman@usecology.com]
Subject: Thermaldyne Process Discussion pfd
Attachments: Thermaldyne PFD Rev 1.pdf

We have prepared a heat and material balance for the Thermaldyne process as proposed for hazardous waste thermal treatment in Louisiana. It is attached. This PFD will be the primary material that we discuss on the call this afternoon.

We will also discuss the fact that in the variance as written by LDEQ, listed waste codes do not apply to 85% of the feed material that is generated as residuals from the hazardous waste recycling. This is contrary to the rulemaking for refinery OBHSM [261.4(a)(12)] that clearly states that all residuals from refinery OBHSM recycling are listed waste F037. The variance as written by LDEQ states:

... Thermaldyne shall make a hazardous waste determination on any residuals generated from the reclamation of the OBHSM. The residuals are a point of new generation of material. Upon intent to be discard the residuals must be properly characterized and managed in accordance with Louisiana Solid Waste and/or Hazardous Waste Regulations as applicable.

The most likely interpretation of the above condition will be that TDU desorber solids will be tested for hazardous waste characteristics (D codes) and if below those levels will be discarded as non-hazardous industrial solid waste, at most. They will not be tested for LDR compliance for either F037 criteria, or UTS UHC criteria. This could also be done for the centrifuge cake that is not "reclaimed" in the TDU but rather simply discarded after centrifuging. Also, waste water that is spilled or otherwise discarded would not be subjected to F037 waste-water LDR testing.

We'll talk at 1 Central.

Carl

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